

**Commonwealth of Kentucky
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

**AIR QUALITY PERMIT
Issued under 401 KAR 52:040**

Permittee Name: Dana Corporation
Mailing Address: Spicer Heavy Axle and Brake Division

Source Name: Dana Corporation
Mailing Address: 1320 West Main Street
Glasgow, Kentucky 42141

Source Location: Same as above

Permit ID: S-02-118 Revision 3
Agency Interest #: 67
Activity ID: APE20070001
Review Type: Minor Source, Operating
Source ID: 21-009-00005

Regional Office: Bowling Green Regional Office
1508 Western Avenue
Bowling Green, Kentucky 42104-3356
(270) 746-7475

County: Barren

Application
Complete Date: December 12, 2002
Issuance Date: January 21, 2003
Revision 1 Date: March 18, 2005
Revision 2 Date: February 14, 2007
Revision 3 Date: November 1, 2007
Expiration Date: January 21, 2013



**John S. Lyons, Director
Division for Air Quality**

SECTION A –PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS

GROUP REQUIREMENTS:

- 17 (058) Hobart-Eaton Welder, construction commenced: 5 January 1988
- 18 (058) Hobart-Eaton Welder, construction commenced: 5 January 1988
- 19 (058) Hobart-Eaton Welder, construction commenced: 5 January 1988
- 33 (059) Hobart-Eaton Welder, construction commenced: 18 May 1992
- 34 (058) Hobart-Eaton Welder, construction commenced: 18 May 1992
- 40 (058) Hobart-Eaton Welder, construction commenced: 23 September 1993
- 35 (100) Hobart-Eaton Welder, construction commenced: 24 February 1995

Description: The emission points are welders using steel welding wire.

Annual hours of operation: 8760 hours/year
Make/Model: Hobart-Eaton
Control device: None

| Emission Sources: | Max Throughputs: | Pollutants: |
|--|-------------------------|--------------------|
| Source 17: Steel welding wire | 14 lbs/hr | PM10, PT |
| 17 (058) – 35(100) continued | | |
| Source 18: Steel welding wire | 59 lbs/hr | PM10, PT |
| Source 19: Steel welding wire | 66 lbs/hr | PM10, PT |
| Source 33, 34, 40: Steel parts processing | 50 pieces/hr | PM10, PT, Mn, Cu |
| Source 45: Steel parts processing | 8 lbs/hr | PM10, PT |

- 32 (-) 11 Cin-Mil T-20 Machining (construction commenced: 9 March 1992)

Description: The emission point is a machining unit with gallon filtration system.

Annual hours of operation: 8760 hours/year
Make/Model: Cin-Mil
Control device: None

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

| | | |
|--------------------------|-------------------------|--------------------|
| Emission Sources: | Max Throughputs: | Pollutants: |
| Steel parts production | 0.476 gal/hr | PM10, PT, Mn, Cu |

37 (036) Dog Collar Welders, construction commenced: 9 February 1993

Description: The emission point is a welder using copper welding wire.

| | |
|-----------------------------------|-----------------|
| Annual hours of operation: | 8760 hours/year |
| Make/Model: | Tekno |
| Control device: | None |

| | | |
|--------------------------|-------------------------|--------------------|
| Emission Sources: | Max Throughputs: | Pollutants: |
| Steel parts processing | 10.26 lbs/hr | PM10, PT |

39 (059) Miller Brake Bracket, construction commenced: 3 April 1993

Description: The emission point is robotic welder using solid steel welding wire.

39 (059) continued

| | |
|-----------------------------------|-----------------|
| Annual hours of operation: | 8760 hours/year |
| Make/Model: | Rob Miller |
| Control device: | None |

| | | |
|--------------------------|-------------------------|---------------------------------|
| Emission Sources: | Max Throughputs: | Pollutants: |
| Steel parts processing | 30 lbs/hr | PM10, PT, C, Al, Mn, Mo, Cu, Zr |

With:

PT – Total particulate matter.

PM10 – Particulate matter equal to or smaller than 10 micrometers.

CO – Carbon monoxide.

NO₂ – Nitrogen dioxide.

SO₂ – Sulfur dioxide.

VOC – Volatile organic compounds.

HAPS – Aluminum (Al), Carbon Black (C), Copper (Cu), Manganese (Mn), Molybdenum (Mo), Potassium Hydroxide (KOH), Zirconium (Zr),

APPLICABLE REGULATIONS: 401 KAR 59:010 New process operations.

Applicable to visible and particulate emissions from each emission point (listed above) commenced on or after 2 July 1975 as follows:

1. **Operating Limitations:** None.

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)**2. Emission Limitations:**

- a. Opacity Standard: Section 3 (1), visible emissions shall not equal or exceed 20 percent opacity, as determined with Reference Method 9, Appendix A 40 CFR 60.
 - i. Compliance demonstration: the permittee shall demonstrate compliance through monitoring and maintenance of the records as specified in points 4. Monitoring Requirements and 5. Recordkeeping Requirements below.
- b. Mass Emission Standard for particulate emissions from all emission points: Section 3 (2), hourly particulate emissions for each emission point as measured by Reference Method 5, Appendix A 40 CFR 60, shall not exceed the limit calculated by the following equation:

$$E = 3.59 P^{0.62}$$

Where E is the particulate emission in lbs/hour and P is the process weight (i.e. the maximum amount of solid scraps/wastes produced or maximum amount of output product) in tons/hour. If the process weight is less than or equal to 0.5 ton/hour, the particulate matter emission limitation shall be 2.34 lbs/hour.

- i. Compliance demonstration: Section 4 (5), the process weight shall be determined in average hourly tons by averaging the daily process weight rate over daily hours of operation. Particulate emissions shall be calculated by the following equation:

$$E = P \times EF$$

Where E is particulate emissions in lbs/hr, P is averaged process weight in tons/hr and EF is the KYEIS particulate emission factor in lbs/ton of process weight.

3. Testing Requirements: None**4. Monitoring Requirements:**

- a. Opacity Standard: To provide reasonable assurance that the visible emission limitations are being met, the permittee shall:
 - i. Determine the opacity of emissions during operation from each stack or vent by Reference Method 9 quarterly, or more frequently if requested by the Division.
 - ii. Perform a qualitative visual observation of the opacity of emissions from each stack/vent on a weekly basis and maintain a log of the observation. See point 5. Recordkeeping Requirements below.
 - iii. Determine the opacity of emissions by Reference Method 9 if visible emissions from any stack/vent is perceived or believed to exceed the applicable standard.
- b. Mass Emission Standard for particulate emissions from all emission points: To provide reasonable assurance that the particulate matter emission limitations are being met, the permittee

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

shall monitor the relevant operating parameters, including but not limited to:

- i. The monthly rate and type of process weight.
- ii. The monthly total hours of operation.
- iii. The number of control equipment malfunction and the duration of each occurrence.

5. Recordkeeping Requirements:

- a. The permittee shall maintain a log of qualitative visual observations performed. The log shall note:
 - i. Whether any air emissions (except for water vapor) were visible from the vent/stack.
 - ii. All emission points from which visible emissions occurred.
 - iii. Whether the visible emissions were normal for the process.
- b. In addition, the permittee shall keep records of the relevant operating parameters, including but not limited to:
 - i. The monthly rate and type of process weight.
 - ii. The monthly total hours of operation.
 - iii. The number of control equipment malfunction and the duration of each occurrence.

6. Reporting Requirements: See SECTION C – GENERAL CONDITIONS C. Reporting Requirements.

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

GROUP REQUIREMENTS:

02 (12-16) Super Allcase Furnace Line, construction commenced: 1 July 1969

Description: The emission point is a steel-processing draw furnace and spray washer.

Annual hours of operation: 8760 hours/year
Make/Model: Allcase
Control device: Flaring

| | | |
|--------------------------|--------------------------|---|
| Emission Sources: | Max Throughputs: | Pollutants: |
| Furnace: | | |
| Natural gas | 5000 ft ³ /hr | CO, NO ₂ , PM10, PT, SO ₂ , VOC |
| Quench Tank: | | |
| Steel parts processing | 1500 lbs/hr | PM10, PT |

03 (23) Forging Press, construction commenced: 1 July 1969

Description: The emission point consists of 2 forging presses processing steel parts.

Annual hours of operation: 8760 hours/year
Make/Model: unknown
Control device: none

03 (23) continued

| | | |
|--------------------------|-------------------------|--------------------|
| Emission Sources: | Max Throughputs: | Pollutants: |
| Steel parts processing | 800 lbs/hr | PM10, PT |

05 (25-27) Phosphating Line, construction commenced: 1 July 1969

Description: The emission point is a process line to phosphate fabricated metal parts.

Annual hours of operation: 8760 hours/year
Make/Model: unknown
Control device: none

| | | |
|--------------------------|-------------------------|--------------------|
| Emission Sources: | Max Throughputs: | Pollutants: |
| Steel parts processing | 5000 lbs/hr | PM10, PT |

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

06 (28-30) 3-Stage Washer, construction commenced: 1 July 1969

Description: The emission point 06 (28-30) is a spray washer.

Annual hours of operation: 8760 hours/year

Make/Model: Maclead

Control device: none

| | | |
|--------------------------|-------------------------|--------------------|
| Emission Sources: | Max Throughputs: | Pollutants: |
| Source 06 (28-30) | | |
| Steel parts processing | 5000 lbs/hr | PM10, PT |

With:

- PT* – Total particulate matter.
- PM10* – Particulate matter equal to or smaller than 10 micrometers.
- CO* – Carbon monoxide.
- NO₂* – Nitrogen dioxide.
- SO₂* – Sulfur dioxide.
- VOC* – Volatile organic compounds.

APPLICABLE REGULATIONS: 401 KAR 61:020 Existing process operations.

Applicable to visible and particulate emissions from each emission point (listed above) commenced before 2 July 1975 as follows:

1. **Operating Limitations:** None.
2. **Emission Limitations:**
 - a. Opacity Standard: Section 3 (1), visible emissions shall not equal or exceed 40 percent opacity, as determined with Reference Method 9, Appendix A 40 CFR 60.
 - i. Compliance demonstration: the permittee shall demonstrate compliance through monitoring and maintenance of the records as specified in points 4. Monitoring Requirements and 5. Recordkeeping Requirements below.
 - b. Mass Emission Standard for particulate emissions from all emission points: Section 3 (2), hourly particulate emissions for each emission point as measured by Reference Method 5, Appendix A 40 CFR 60, shall not exceed the limit calculated by the following equation:

$$E = 4.10 P^{0.67}$$

Where E is the particulate emission in lbs/hour and P is the process weight (i.e. the maximum amount of solid scraps/wastes produced or maximum amount of output product) in tons/hour. If the process weight is less than or equal to 0.50 ton/hour, the particulate matter emission limitation shall be 2.58 lbs/hour.

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

- i. Compliance demonstration: Section 4 (1), the process weight shall be determined in average hourly tons by averaging the daily process weight rate over daily hours of operation. Particulate emissions shall be calculated by the following equation:

$$E = P \times EF$$

Where E is particulate emissions in lbs/hr, P is averaged process weight in tons/hr and EF is the KYEIS particulate emission factor in lbs/ton of process weight.

3. Testing Requirements: None**4. Monitoring Requirements:**

- a. Opacity Standard: To provide reasonable assurance that the visible emission limitations are being met, the permittee shall:
 - i. Determine the opacity of emissions during operation from each stack or vent by Reference Method 9 quarterly, or more frequently if requested by the Division.
 - ii. Perform a qualitative visual observation of the opacity of emissions from each stack/vent on a weekly basis and maintain a log of the observation. See point 5. Recordkeeping Requirements below.
 - iii. Determine the opacity of emissions by Reference Method 9 if visible emissions from any stack/vent is perceived or believed to exceed the applicable standard.
- b. Mass Emission Standard for particulate emissions from all emission points: To provide reasonable assurance that the particulate matter emission limitations are being met, the permittee shall monitor the relevant operating parameters, including but not limited to:
 - i. The monthly rate and type of process weight.
 - ii. The monthly total hours of operation.
 - iii. The number of control equipment malfunction and the duration of each occurrence.

5. Recordkeeping Requirements:

- a. The permittee shall maintain a log of qualitative visual observations performed. The log shall note:
 - i. Whether any air emissions (except for water vapor) were visible from the vent/stack.
 - ii. All emission points from which visible emissions occurred.
 - iii. Whether the visible emissions were normal for the process.
- c. In addition, the permittee shall keep records of the relevant operating parameters, including but not limited to:
 - i. The monthly rate and type of process weight.
 - ii. The monthly total hours of operation.
 - iii. The number of control equipment malfunction and the duration of each occurrence.

6. Reporting Requirements: See SECTION C – GENERAL CONDITIONS, C. Reporting Requirements.

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

GROUP REQUIREMENTS:

16 (-) Quench Presses, construction commenced: 30 January 1984

Description: The emission point consists of 12 quench presses.

Annual hours of operation: 8760 hours/year
Make/Model: unknown
Control device: none

| | | |
|--------------------------|-------------------------|--------------------|
| Emission Sources: | Max Throughputs: | Pollutants: |
| Steel parts processing | 1894 lbs/hr | PM10, PT |

With:

- PT* – Total particulate matter.
- PM10* – Particulate matter equal to or smaller than 10 micrometers.

APPLICABLE REGULATIONS: 401 KAR 63:010 Fugitive Emissions.

Applicable to visible and particulate emissions from each emission point (listed above) as follows:

1. **Operating Limitations:** None.
2. **Emission Limitations:** Section (3), fugitive particle emissions shall be controlled in compliance with the regulation.
3. **Testing Requirements:** None
4. **Monitoring Requirements:** None
5. **Recordkeeping Requirements:** None.
6. **Reporting Requirements:** See SECTION C – GENERAL CONDITIONS, C. Reporting Requirements.

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

GROUP REQUIREMENTS:

- 55 (055) Heat Treatment System, Vacuum Pump 1, construction commenced: July 2006
- 56 (056) Heat Treatment System, Vacuum Pump 2, construction commenced: July 2006
- 57 (057) Heat Treatment System, Vacuum Pump 3, construction commenced: July 2006

Description: The heat treat equipment emission sources consist of three vacuum pump units. Three vacuum pumps 1, 2, and 3 emit the emissions from the unit through EP55, EP56, and EP57, respectively.

Annual hours of operation: 8760 hours/year
Make/Model: unknown
Control device: none

| | | |
|--------------------------|-------------------------|--------------------|
| Emission Sources: | Max Throughputs: | Pollutants: |
| Vacuum pumps 1,2, and 3 | 1.65 ton/hr | VOC, HAPs |

With:
 VOC – Volatile organic compounds.

APPLICABLE REGULATIONS: None

1. **Operating Limitations:** None.
2. **Emission Limitations:** None
3. **Testing Requirements:** None
4. **Monitoring Requirements:**
 The permittee shall monitor the relevant operating parameters, including but not limited to:
 - a. The monthly rate and type of process weight.
 - b. The monthly total hours of operation.
5. **Recordkeeping Requirements:**
 The permittee shall keep records of the relevant operating parameters, including but not limited to:
 - a. The monthly rate and type of process weight.
 - b. The monthly total hours of operation.
6. **Reporting Requirements:** See SECTION C – GENERAL CONDITIONS, C. Reporting Requirements.

SECTION C – GENERAL

1. Administrative Requirements

- a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
- b. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
- c. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-11 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- d. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition [Section 1a-4, 5, of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- e. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- f. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040 Section 11(3)].
- g. This permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in 401 KAR 50:038, Air emissions fee. The permittee shall submit an annual emissions certification pursuant to 401 KAR 52:040, Section 20.
- h. All previously issued permits to this source at this location are hereby null and void.

SECTION C – GENERAL CONDITIONS

2. Recordkeeping Requirements

- a. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040 Section 3(1)(f) and Section 1b-IV-2 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

3. Reporting Requirements

- a. (1) In accordance with the provisions of 401 KAR 50:055, Section 1, the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- (2) The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition a.(1) above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report [Section 1b-V-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the permit [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- c. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the

SECTION C – GENERAL CONDITIONS

emission unit was not in operation. The summary reports are due January 30th and July 30th of each year. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

4. Inspections

In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency:

- a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation.
- b. To access and copy any records required by the permit.
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit.
- d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

5. Emergencies/Enforcement Provisions

- a. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - (1) An emergency occurred and the permittee can identify the cause of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- c. Emergency provisions listed in General Condition 5.b are in addition to any emergency or upset provision contained in an applicable requirement [401 KAR 52:040, Section 22(1)].
- d. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:040, Section 22(2)].

SECTION C – GENERAL CONDITIONS

6. Compliance

- a. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
 - (1) Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
 - (2) All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and nonroutine maintenance performed on each control device. Daily observations are required during daylight hours of all operations, control equipment and any visible emissions to determine whether conditions appear to be either normal or abnormal. If the operations, controls and/or emissions appear to be abnormal, the permittee must then comply with the requirements of Section C – General Conditions, 3.a.(2), of this permit.
 - (3) A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division [401 KAR 50:055, Section 2].

- b. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
 - (1) Identification of the term or condition;
 - (2) Compliance status of each term or condition of the permit;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The method used for determining the compliance status for the source, currently and over the reporting period, and
 - (5) For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
 - (6) The certification shall be postmarked by January 30th of each year. Annual compliance certifications shall be mailed to the following addresses:

Division for Air Quality
Bowling Green Regional Office
1508 Western Ave.
Bowling Green, KY 42104-3356

Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601-1403

SECTION C – GENERAL CONDITIONS

- c. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
 - (1) Applicable requirements that are included and specifically identified in this permit; or
 - (2) Non-applicable requirements expressly identified in this permit [401 KAR 52:040, Section 11].

SECTION D – INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to a general applicable regulation shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspections and observations shall be recorded in a log, noting color, duration, density (heavy or light), cause, and any corrective actions taken due to abnormal visible emissions.

| Unit Number | Description | Generally Applicable Regulation |
|----------------------|---|--|
| 08 (01-06) | Two Carburizing Furnaces | None |
| 09 (017-019) | Three Endothermic Atmosphere Generators | None |
| 10 (038) | Heat Exchanger | 401 KAR 61:015 |
| 11 (045) | Endothermic Atmosphere Generator | 401 KAR 53:010 |
| 12 (046, 047, 050) | Carburizing Furnaces | 401 KAR 53:010 |
| 13 (048, 049) | Two Drawing Furnaces | None |
| 14 (-) | Rotary Hardening Furnaces | 401 KAR 53:010 |
| 16 (-) | Two Quench Presses | 401 KAR 63:010 |
| 22 (062-063) | Dip Tank & Mix Booth | 401 KAR 63:022 |
| 24 (082-084,087-090) | Seven 8000 Gallon Tanks (1-4, 7-9) | None |
| 25 (075-081) | Seven 8000 Gallon Tanks (10-16) | None |
| 26 (073, 074) | Two 8000 Gallon Tanks (17, 18) | None |
| 27 (069-072) | Four 8000 Gallon Tanks (19-22) | None |
| 28 (092, 095) | 7500 & 3600 Gallon Tanks (92, 95) | None |
| 29 (085, 086) | Two 8000 Gallon Tanks (5, 6) | None |
| 43 (099) | Heat Exchanger | 401 KAR 59:015 |
| 44 (100) | Heat Exchanger | 401 KAR 59:015 |
| 48 (048) | Rotary Hearth Furnace line | 401 KAR 59:010 |
| 53 (053) | Backup Diesel Generator | 401 KAR 59:010 |
| 54 (054) | Aqueous Wash for Heat Treatment System | None |
| 06 (029) | 4 Aqueous Wash systems | None |
| 13 (-) | Super Allcase Furnace | 401 KAR 59:010 |
| 31 (-) | Heat Treatment Metal. Lab | 401 KAR 59:010 |
| 36 (-) | Two Induction Hardeners | None |
| 41 (-) | Welder (Eaton 201779) | 401 KAR 59:010 |
| 46 (-) | HCL Storage Tank | 401 KAR 59:010 |
| 47 (-) | Tocco Induction Hardening Unit | None |
| 58(-) | Rx Generator | 401 KAR 59:015 401 KAR 59:010 |